

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Amendment of Part 90)
of the Commission's Rules) WT Docket No. 07-100

Comments of Pros Ltd

Administrative Correction

In Appendix C (*Derating Contour Comparison Case, South West Communications Center*), the Contour Legend on each page is incorrectly labeled.

The originally submitted legend states that the *LMCC's Consensus 6.25 kHz Adjacent Channel Contour* and the *TSB88 Based 6.25 kHz Adjacent Channel Contour* is represented.

This is incorrect.

What is actually shown is the *LMCC's 12.5 kHz Adjacent Channel Contour* and the *Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour*. These are the actual contours shown, with the correct Color and dBu rating. There is no change to the substance of our comments.

Original Legend:

Description	Color	dBu
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's Consensus 6.25 kHz Adjacent Channel Contour:	Blue	33.5
TSB88 Based 6.25 Adjacent Channel Contour:	Orange	61

Corrected Legend

Description	Color	dBu
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

The entire corrected Appendix is attached below.

Appendix C
Derating Contour Comparison Case
South West Communications Center - Corrected Copy

This is a comparison of the LMCC and the Prioritized TSB88 based clearance criteria for narrow UHF 11 kHz analog channels spaced 12.5 kHz from wide 16 kHz analog channels.

The South West Regional Communications Center is located in the heavily congested area of Dallas County TX (Metro Dallas). This system is authorized to operate under callsigns WQHI703 and WQHI705.

The system was constructed and placed into operation on or before 05/29/2008.

The system consists of 3 sites, and has 5 UHF 11 kHz channels per site. The system is a centralized trunked system, requiring a dedicated control channel on each site. The control channels rotate every 24 hours, so each frequency on each site stays in continuous carrier mode for an average of 73 days a year.

Of the fifteen channels assigned to the system, 14 fail current LMCC adjacent channel clearance standards of a 12.5 kHz interference contour derating (a 33.5 dBu interference contour for adjacent wideband channels).

Eight of the 14 channels which failed the LMCC standard, also fails the TSB88 based clearance standard of a 40 dB derating (a 61 dBu interference contour for adjacent wideband channels).

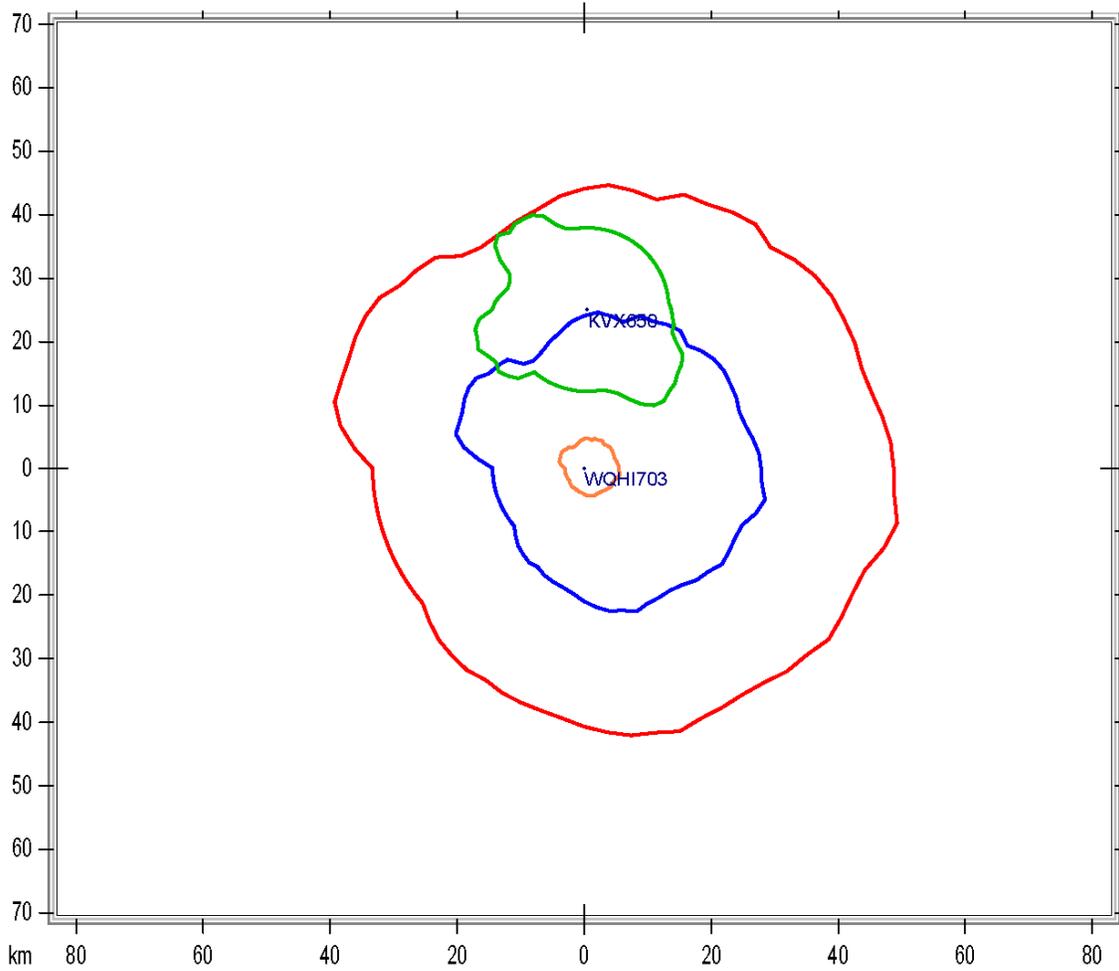
This system has received no known complaints due to adjacent channel interference. This system has received no known interference due to adjacent channel stations.

Notes for all studies:

1. Only pertinent existing adjacent stations are included.
2. Some data has been rounded in this presentation for clarity. The graphics were generated with the more precise data.
3. Below each graphic, the yellow highlighted station is the "interferer". All other stations are adjacent channel stations.
4. Some emissions have been redacted for space.

Appendix C
 Derating Contour Comparison Case
 South West Communications Center - Corrected Copy

WQHI703 Loc 3 453.3625 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

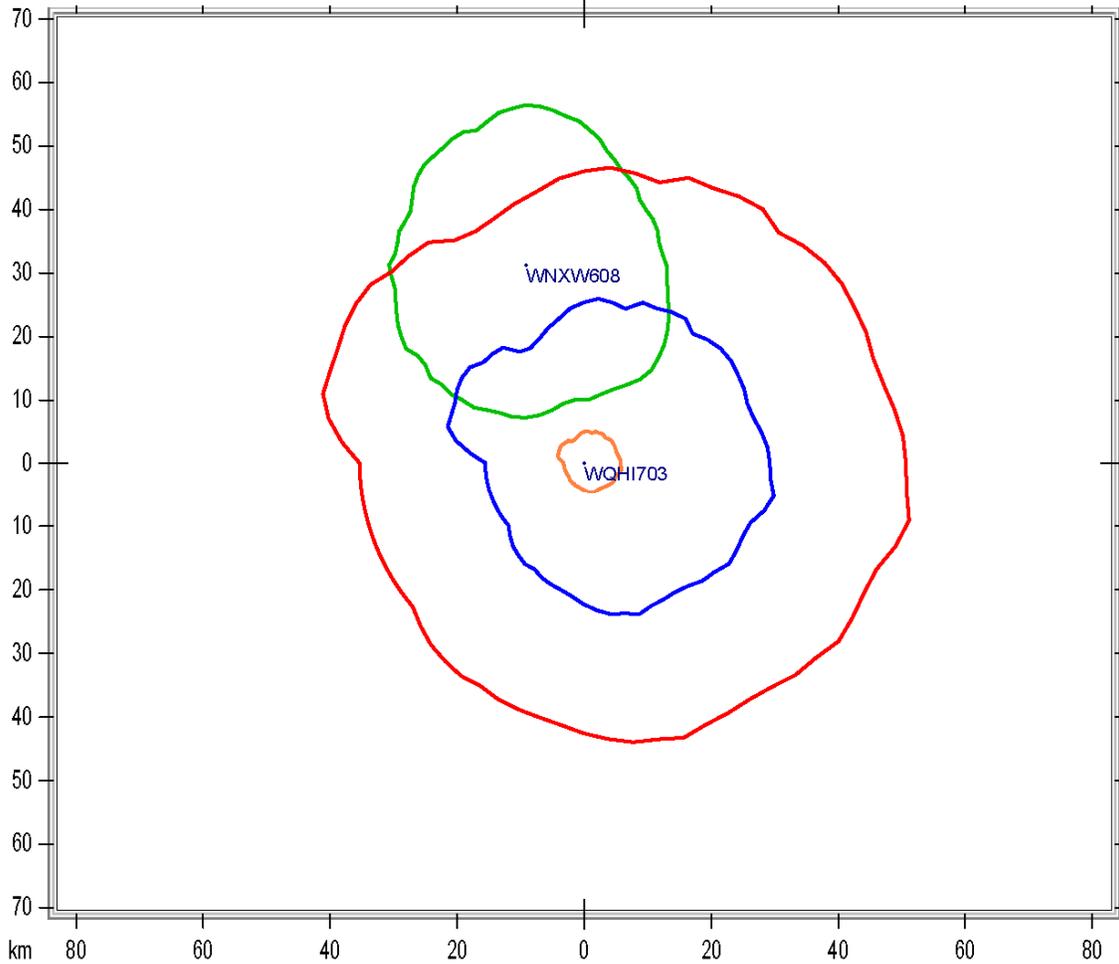
Call Sign	Emissions	Freq	Dist km	ERP w	Class	GL m	AGL m	HAAT m	Lat	Lon
WQHI703	11K2F3E	453.3625	0	80	FB8	196	52	63	32-35-18.0 N	96-50-43.0 W
KVX650	11K2F3E 20K0F3E	453.35	25	185	FB2	130	51	33	32-48-48.0 N	96-50-25.0 W

Contour Legend

Description	Color	dBu
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

Appendix C
Derating Contour Comparison Case
South West Communications Center - Corrected Copy

WQHI703 Loc 3 453.3875 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

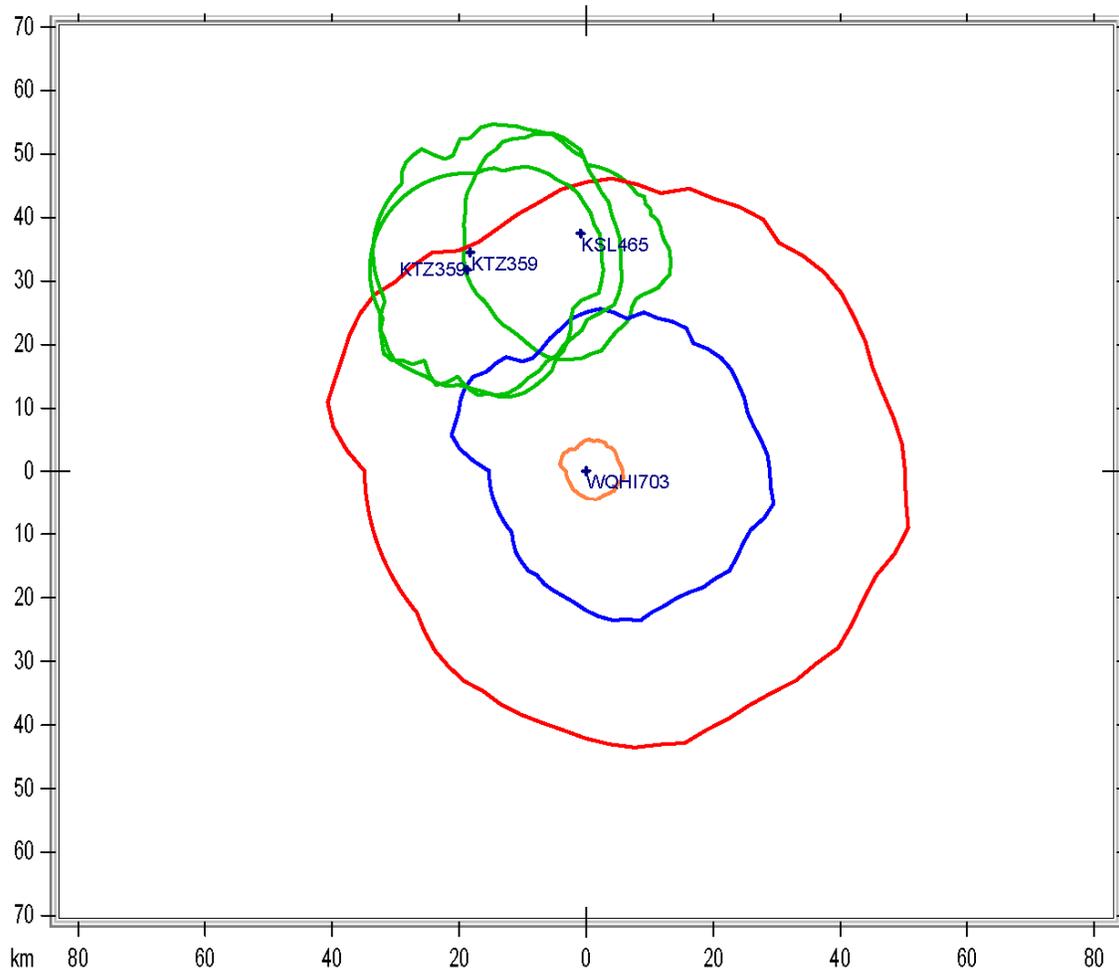
Call Sign	Emissions	Freq	Dist km	ERP w	Class	GL m	AGL m	HAAT m	Lat	Lon
WQHI703	11K2F3E	453.3875	0	100	FB8	196	52	63	32-35-18.0 N	96-50-43.0 W
WNXW608	20K0F3E	453.4	32	200	FB2	133	99	85	32-52-09.0 N	96-56-35.0 W

Contour Legend

Description	Color	dBu
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

Appendix C
Derating Contour Comparison Case
South West Communications Center - Corrected Copy

WQHI703 Loc 3 453.5125 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

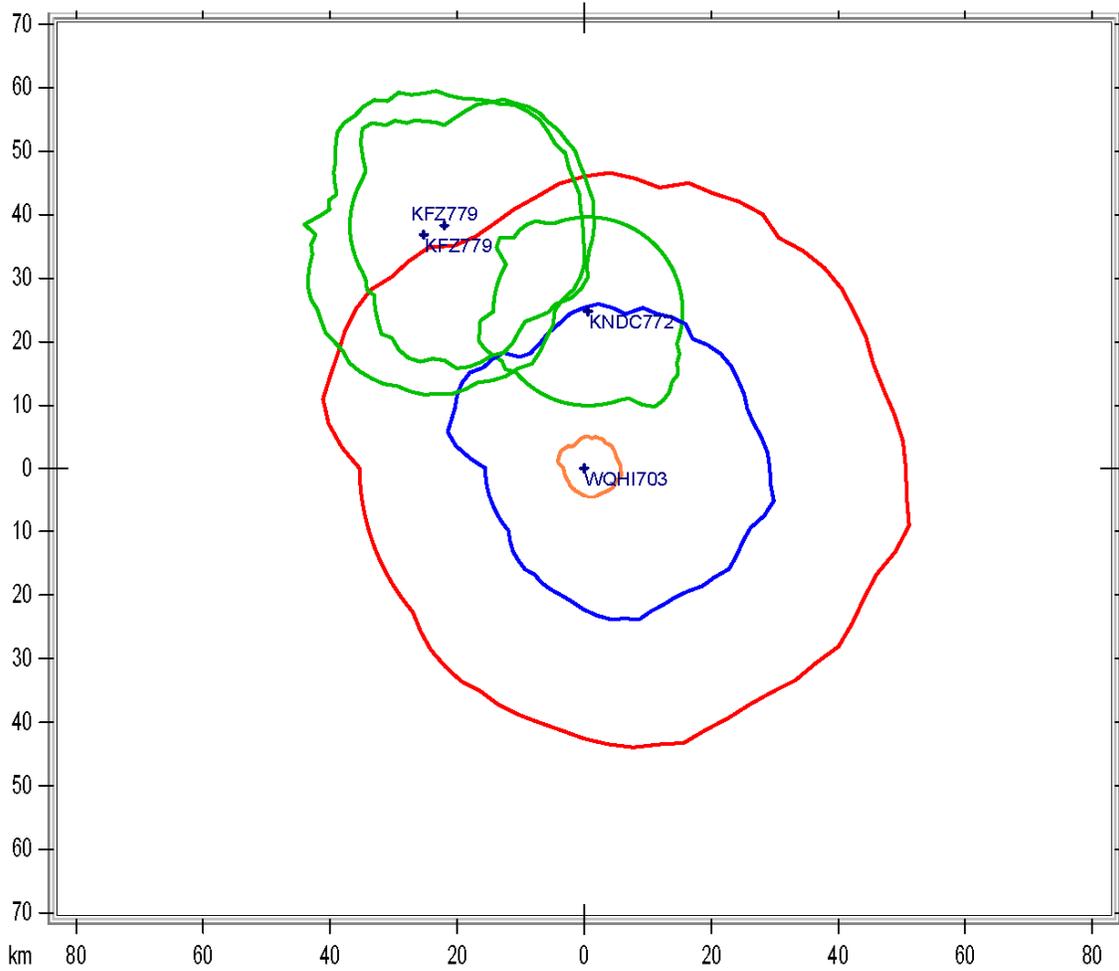
<u>Call Sign</u>	<u>Emissions</u>	<u>Freq</u>	<u>Dist km</u>	<u>ERP w</u>	<u>Class</u>	<u>GL m</u>	<u>AGL m</u>	<u>HAAT m</u>	<u>Lat</u>	<u>Lon</u>
KSL465	20K0F3E	453.5	37	90	FB	178	48	63	32-55-31.0 N	96-51-16.0 W
WQHI703	11K2F3E	453.5125	0	95	FB8	196	52	63	32-35-18.0 N	96-50-43.0 W
KTZ359	20K0F3E	453.525	37	350	FB2	170	24	34	32-52-25.0 N	97-02-44.0 W
KTZ359	20K0F3E	453.525	39	350	FB2	176	30	46	32-53-54.0 N	97-02-25.0 W

Contour Legend

<u>Description</u>	<u>Color</u>	<u>dBu</u>
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

Appendix C
 Derating Contour Comparison Case
 South West Communications Center - Corrected Copy

WQHI703 Loc 3 453.5875 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

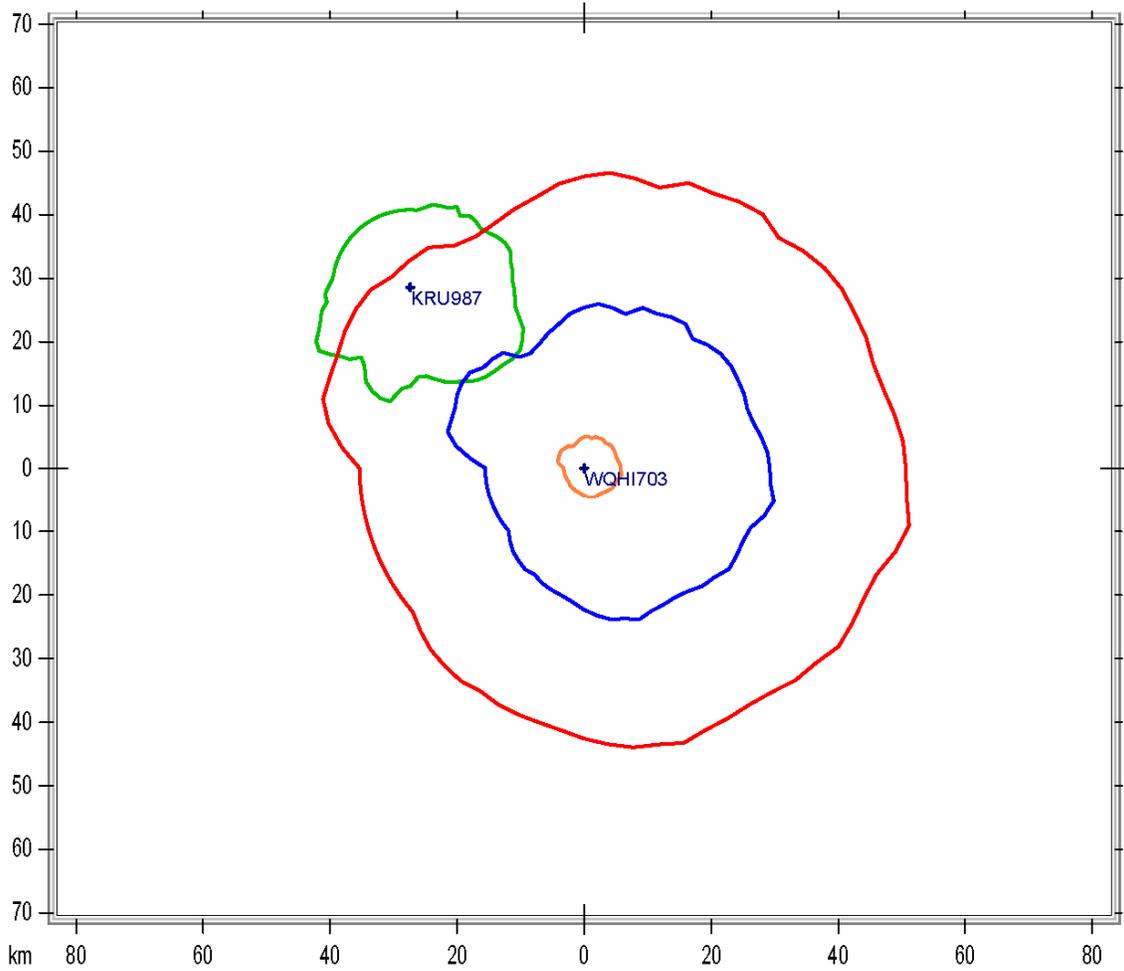
<u>Call Sign</u>	<u>Emissions</u>	<u>Freq</u>	<u>Dist km</u>	<u>ERP w</u>	<u>Class</u>	<u>GL m</u>	<u>AGL m</u>	<u>HAAT m</u>	<u>Lat</u>	<u>Lon</u>
KNDC772	20K0F3E	453.575	25	320	FB2	137	30	20	32-48-39.0 N	96-50-19.0 W
KFZ779	20K0F9W	453.575	44	316	FB	195	23	47	32-55-57.0 N	97-04-49.0 W
KFZ779	20K0F3E	453.575	45	316	FB2	187	56	68	32-55-11.0 N	97-06-54.0 W
WQHI703	11K2F3E	453.5875	0	100	FB8	196	52	63	32-35-18.0 N	96-50-43.0 W

Contour Legend

<u>Description</u>	<u>Color</u>	<u>dBu</u>
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

Appendix C
 Derating Contour Comparison Case
 South West Communications Center - Corrected Copy

WQHI703 Loc 3 453.7625 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

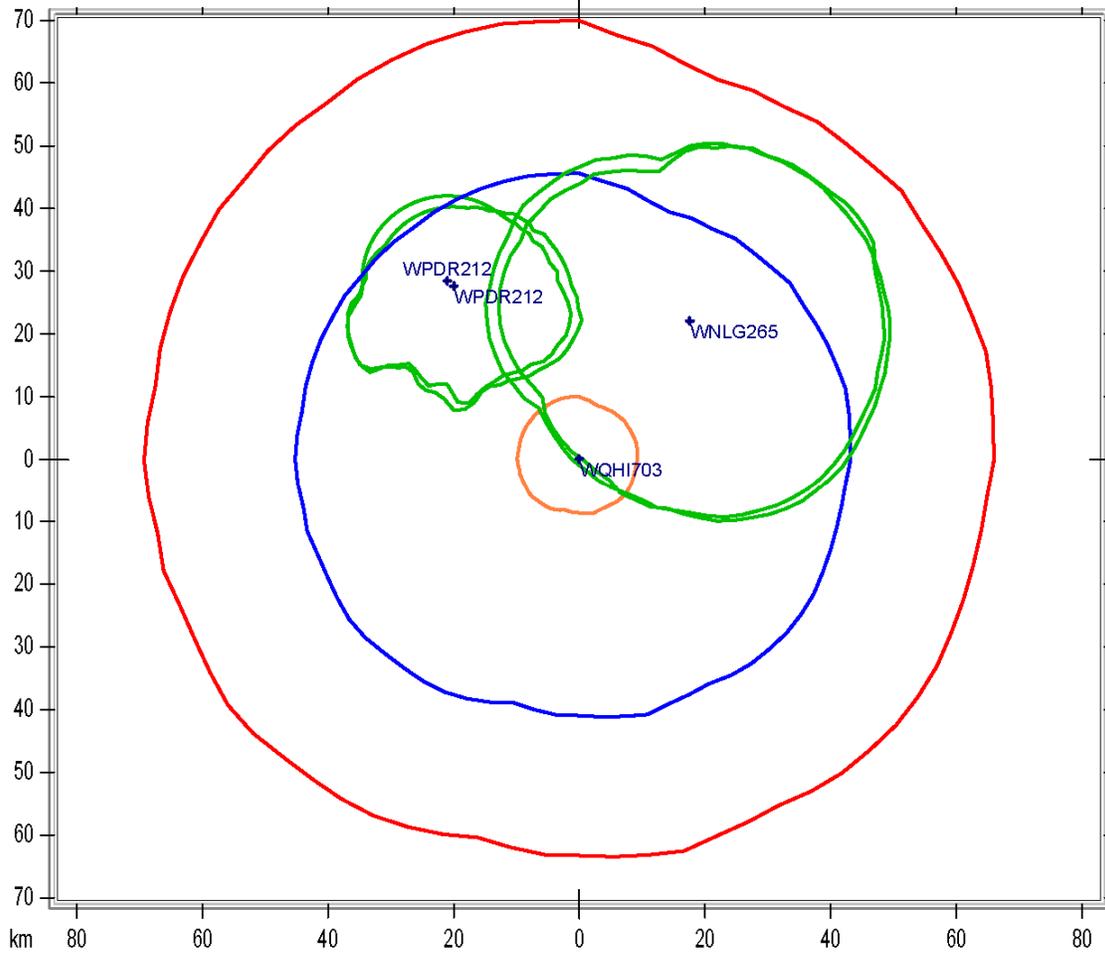
Call Sign	Emissions	Freq	Dist km	ERP w	Class	GL m	AGL m	HAAT m	Lat	Lon
WQHI703	11K2F3E	453.7625	0	100	FB8	196	52	63	32-35-18.0 N	96-50-43.0 W
KRU987	20K0F3E	453.7500	39.51	148	FB2	183	30	41	32-50-42.0 N	97-08-15.0 W

Contour Legend

Description	Color	dBu
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

Appendix C
Derating Contour Comparison Case
South West Communications Center - Corrected Copy

WQHI703 Loc 1 460.0375 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

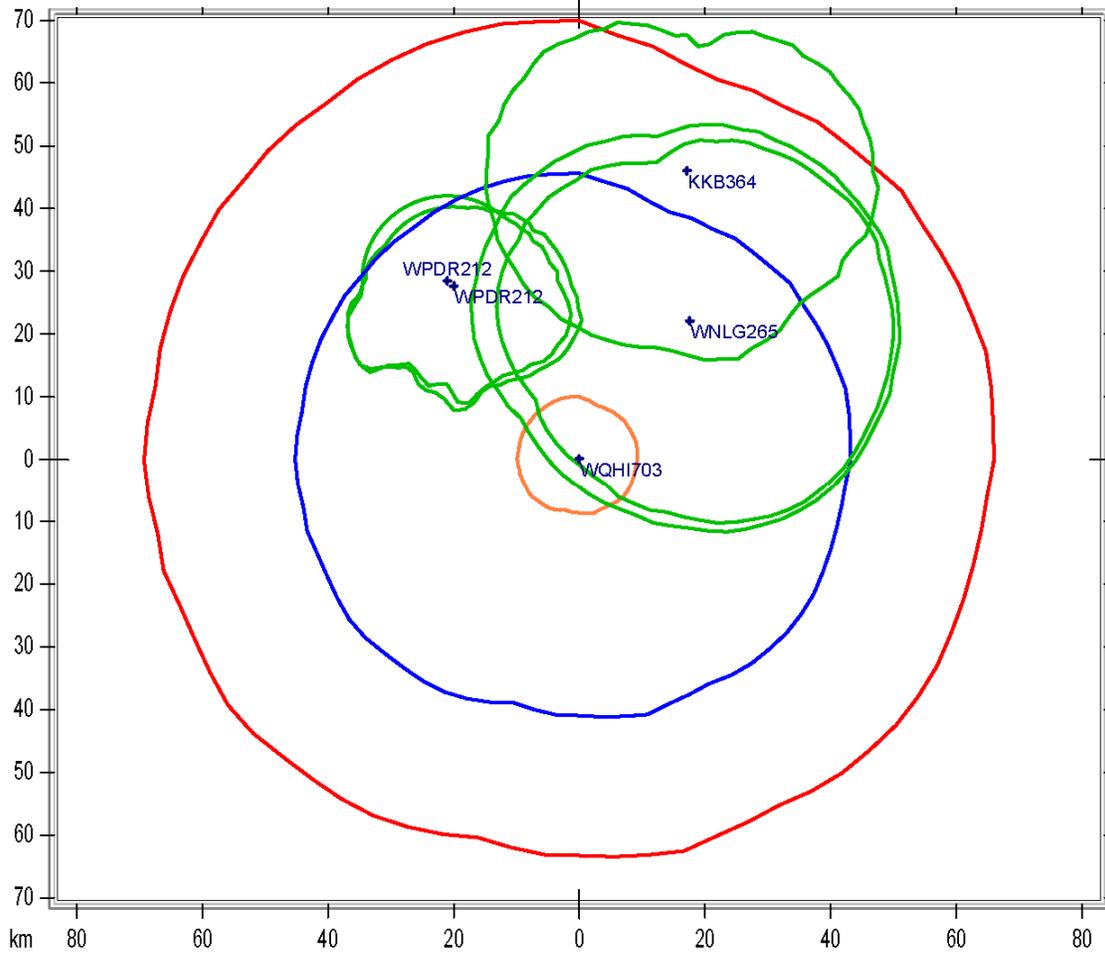
<u>Call Sign</u>	<u>Emissions</u>	<u>Freq</u>	<u>Dist km</u>	<u>ERP w</u>	<u>Class</u>	<u>GL m</u>	<u>AGL m</u>	<u>HAAT m</u>	<u>Lat</u>	<u>Lon</u>
WNLG265	20K0F3E	460.025	28	400	FB2	141	122	116	32-46-57.0 N	96-46-32.0 W
KKB364	20K0F3E	460.025	29	450	FB2	138	114	107	32-46-41.0 N	96-45-30.0 W
WQHI703	11K2F3E	460.0375	0	151	FB8	249	169	227	32-35-03.0 N	96-57-49.0 W
WPDR212	20K0F3E	460.05	34	171	FB2	178	43	46	32-49-57.0 N	97-10-37.0 W
WPDR212	20K0F3E	460.05	35	225	FB2	178	35	33	32-50-24.0 N	97-11-16.0 W

Contour Legend

<u>Description</u>	<u>Color</u>	<u>dBu</u>
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

Appendix C
Derating Contour Comparison Case
South West Communications Center - Corrected Copy

WQHI703 Loc 1 460.1625 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

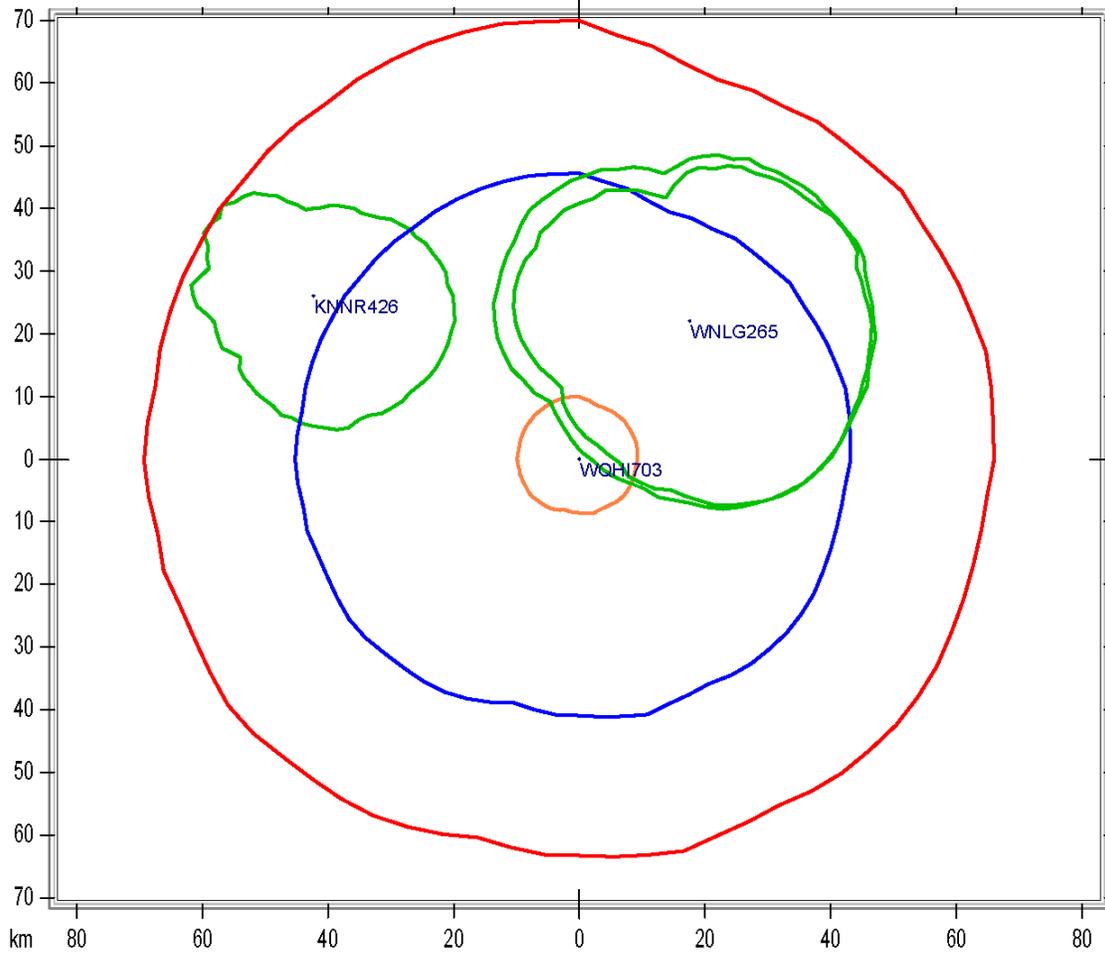
<u>Call Sign</u>	<u>Emissions</u>	<u>Freq</u>	<u>Dist km</u>	<u>ERP w</u>	<u>Class</u>	<u>GL m</u>	<u>AGL m</u>	<u>HAAT m</u>	<u>Lat</u>	<u>Lon</u>
WPDR212	20K0F3E	460.15	34	171	FB2	178	43	46	32-49-57.0 N	97-10-37.0 W
WPDR212	20K0F3E	460.15	35	225	FB2	178	35	33	32-50-24.0 N	97-11-16.0 W
WQHI703	11K2F3E	460.1625	0	151	FB8	249	169	227	32-35-03.0 N	96-57-49.0 W
WNLG265	20K0F3E	460.175	28	400	FB2	141	152	146	32-46-57.0 N	96-46-32.0 W
KKB364	20K0F3E	460.175	29	370	FB2	138	132	125	32-46-41.0 N	96-45-30.0 W
KKB364	20K0F3E	460.175	49	700	FB2	209	52	74	32-59-53.0 N	96-46-48.0 W

Contour Legend

<u>Description</u>	<u>Color</u>	<u>dBu</u>
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

Appendix C
Derating Contour Comparison Case
South West Communications Center - Corrected Copy

WQHI703 Loc 1 460.2375 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

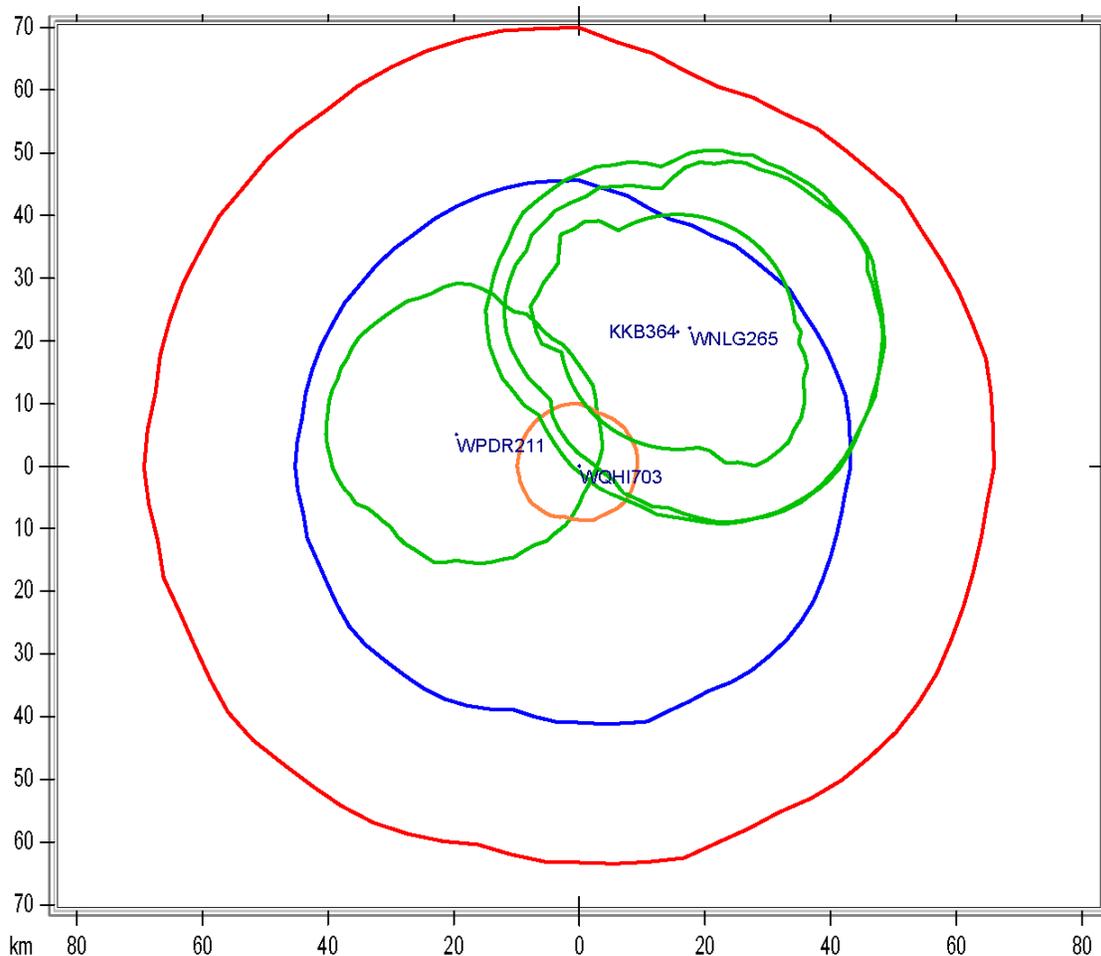
<u>Call Sign</u>	<u>Emissions</u>	<u>Freq</u>	<u>Dist km</u>	<u>ERP w</u>	<u>Class</u>	<u>GL m</u>	<u>AGL m</u>	<u>HAAT m</u>	<u>Lat</u>	<u>Lon</u>
WNLG265	20K0F3E	460.225	28	400	FB2	141	107	101	32-46-57.0 N	96-46-32.0 W
KKB364	20K0F3E	460.225	29	425	FB2	138	93	86	32-46-41.0 N	96-45-30.0 W
WQHI703	11K2F3E	460.2375	0	151	FB8	249	169	227	32-35-03.0 N	96-57-49.0 W
KNNR426	20K0F3E 11K2F3E	460.25	50	98	FB2	234	55	84	32-49-06.0 N	97-24-56.0 W

Contour Legend

<u>Description</u>	<u>Color</u>	<u>dBu</u>
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

Appendix C
Derating Contour Comparison Case
South West Communications Center - Corrected Copy

WQHI703 Loc 1 460.3125 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

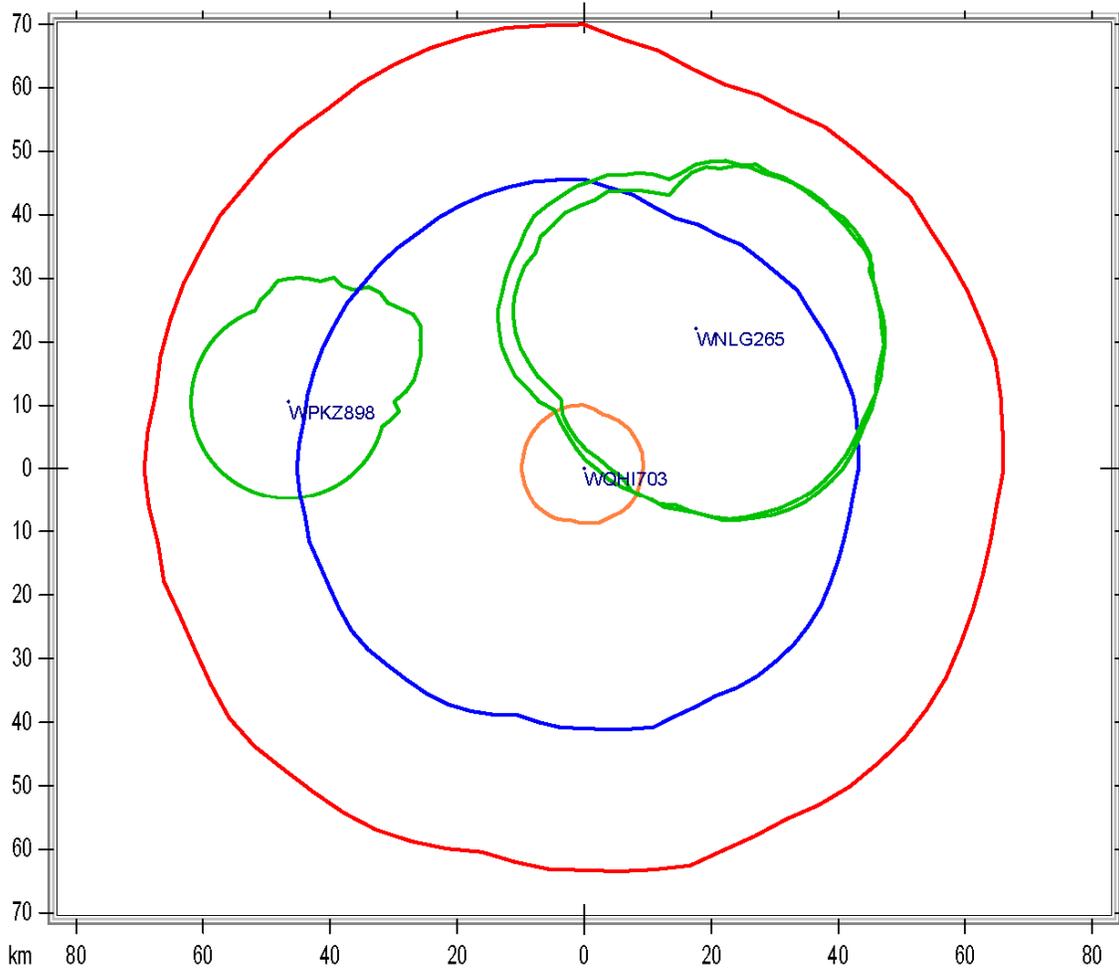
<u>Call Sign</u>	<u>Emissions</u>	<u>Freq</u>	<u>Dist km</u>	<u>ERP w</u>	<u>Class</u>	<u>GL m</u>	<u>AGL m</u>	<u>HAAT m</u>	<u>Lat</u>	<u>Lon</u>
WPDR211	16K0F1D	460.3	20	95	FB2	206	91	107	32-37-46.0 N	97-10-20.0 W
WQHI703	11K2F3E	460.3125	0	151	FB8	249	169	227	32-35-03.0 N	96-57-49.0 W
KKB364	20K0F3E	460.325	27	700	FB2	138	36	25	32-46-36.0 N	96-47-46.0 W
WNLG265	20K0F3E	460.325	28	400	FB2	141	122	116	32-46-57.0 N	96-46-32.0 W
KKB364	20K0F3E	460.325	29	450	FB2	138	104	97	32-46-41.0 N	96-45-30.0 W

Contour Legend

<u>Description</u>	<u>Color</u>	<u>dBu</u>
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

Appendix C
Derating Contour Comparison Case
South West Communications Center - Corrected Copy

WQHI703 Loc 1 460.4625 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

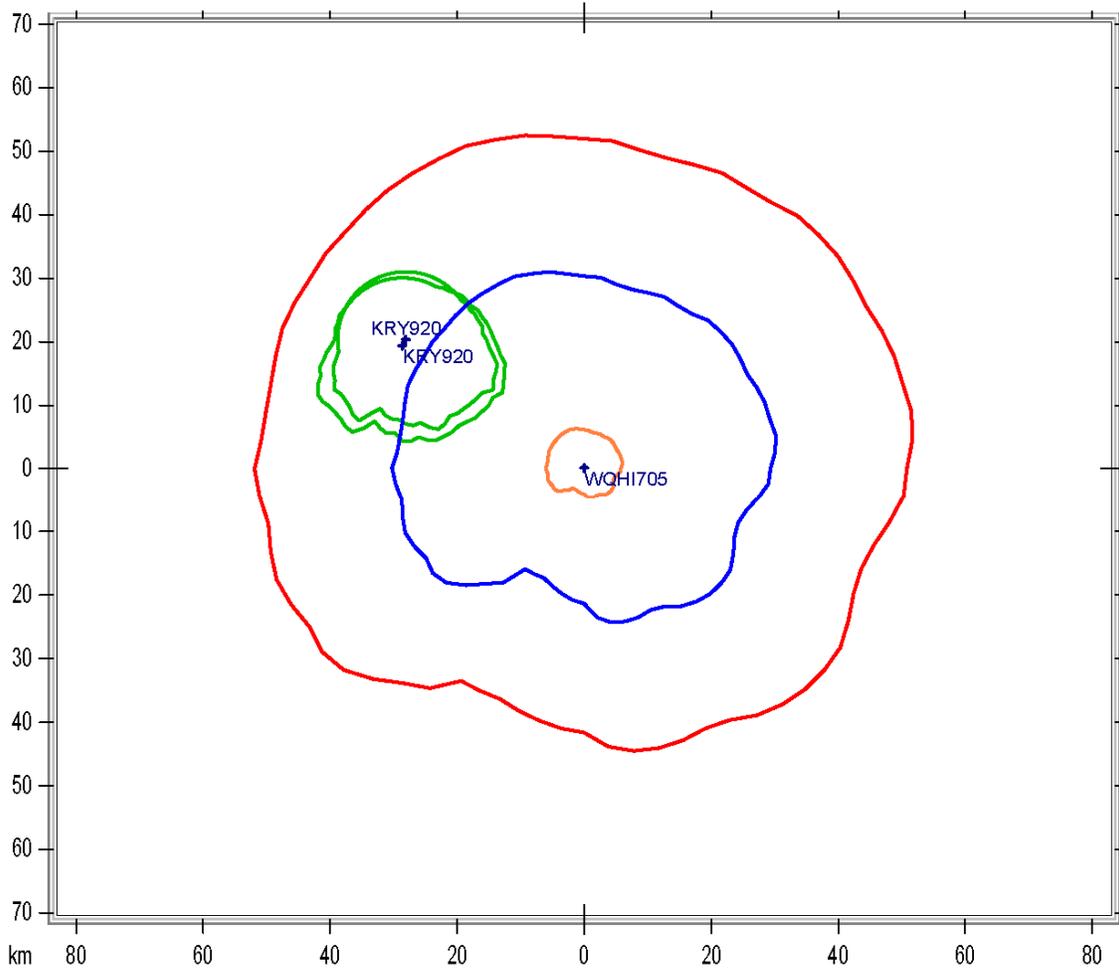
<u>Call Sign</u>	<u>Emissions</u>	<u>Freq</u>	<u>Dist km</u>	<u>ERP w</u>	<u>Class</u>	<u>GL m</u>	<u>AGL m</u>	<u>HAAT m</u>	<u>Lat</u>	<u>Lon</u>
WPKZ898	20K0F3E	460.45	48	354	FB2	214	36	21	32-40-43.0 N	97-27-40.0 W
WQHI703	11K2F3E	460.4625	0	151	FB8	249	169	227	32-35-03.0 N	96-57-49.0 W
WNLG265	20K0F3E	460.475	28	400	FB2	141	107	101	32-46-57.0 N	96-46-32.0 W
KKB364	20K0F3E	460.475	29	430	FB2	138	99	92	32-46-41.0 N	96-45-30.0 W

Contour Legend

<u>Description</u>	<u>Color</u>	<u>dBu</u>
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

Appendix C
Derating Contour Comparison Case
South West Communications Center - Corrected Copy

WQHI705 Loc 1 453.3125 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

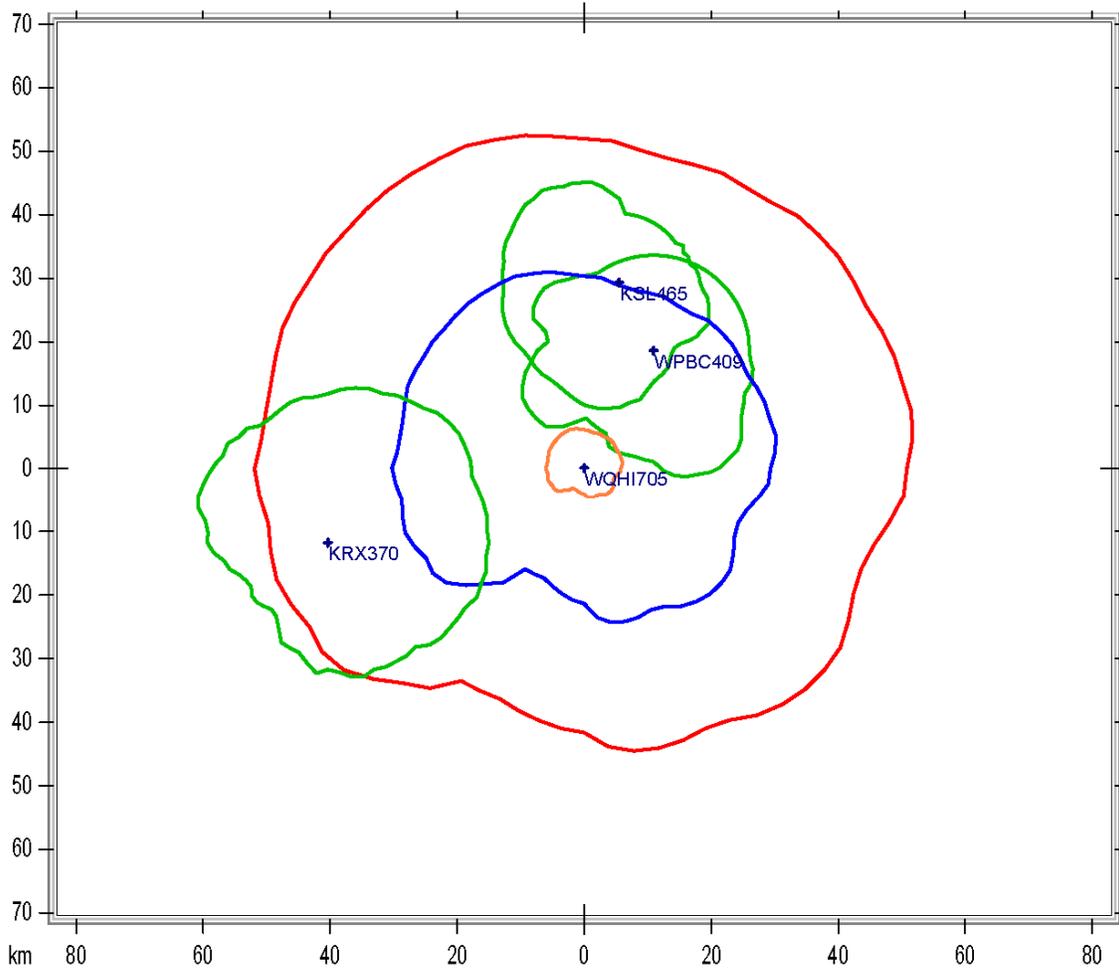
Call Sign	Emissions	Freq	Dist km	ERP w	Class	GL m	AGL m	HAAT m	Lat	Lon
WQHI705	11K2F3E	453.3125	0	100	FB8	230	40	94	32-39-43.0 N	96-54-49.0 W
KRY920	20K0F3E	453.3000	35	85	FB2	180	46	43	32-50-08.0 N	97-13-11.0 W
KRY920	20K0F3E	453.3000	35	85	FB2	185	30	30	32-50-39.0 N	97-12-50.0 W

Contour Legend

Description	Color	dBu
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

Appendix C
Derating Contour Comparison Case
South West Communications Center - Corrected Copy

WQHI705 Loc 1 453.4875 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

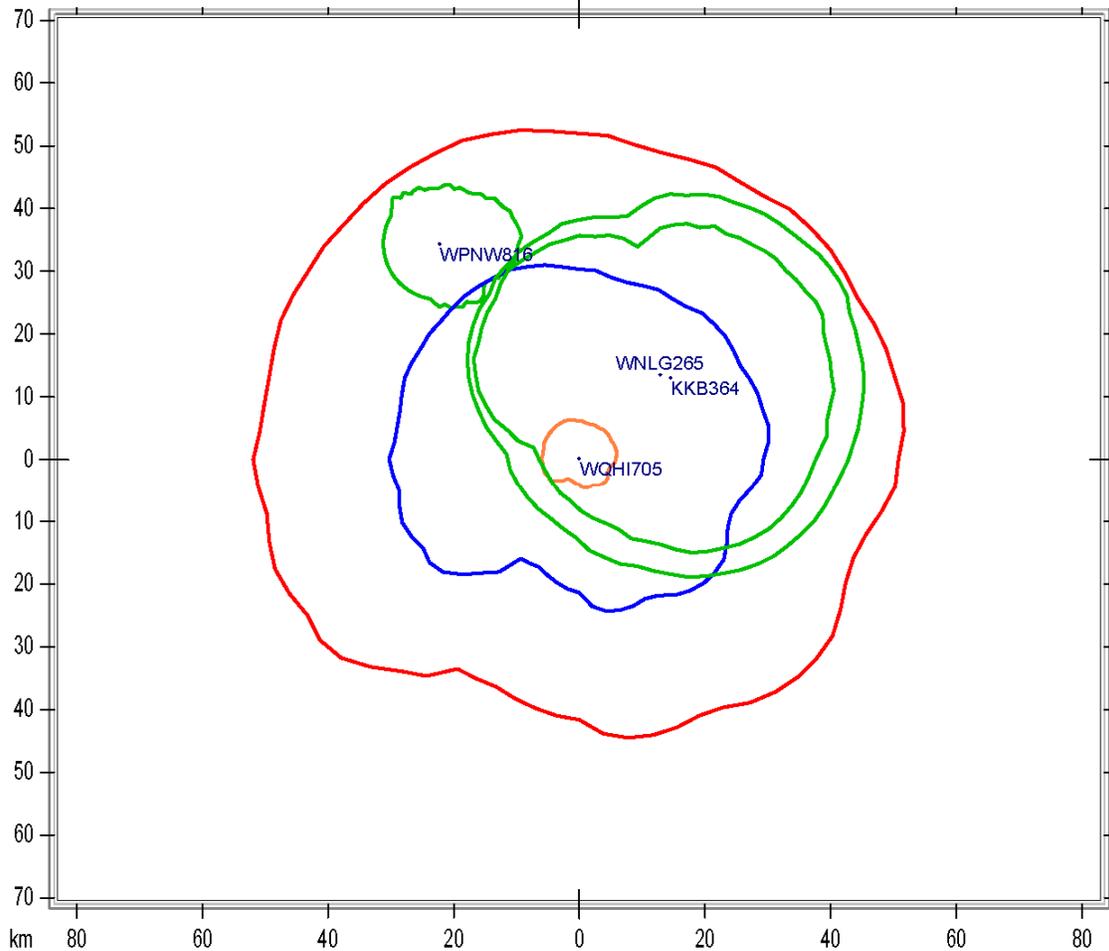
<u>Call Sign</u>	<u>Emissions</u>	<u>Freq</u>	<u>Dist km</u>	<u>ERP w</u>	<u>Class</u>	<u>GL m</u>	<u>AGL m</u>	<u>HAAT m</u>	<u>Lat</u>	<u>Lon</u>
WPBC409	20K0F3E	453.4750	21.47	335	FB2	152	31	28	32-49-42.0 N	96-47-47.0 W
WQHI705	11K2F3E	453.4875	0	100	FB8	230	40	94	32-39-43.0 N	96-54-49.0 W
KSL465	20K0F3E	453.5000	29.72	90	FB	178	48	63	32-55-31.0 N	96-51-16.0 W
KRX370	20K0F3E	453.5000	42.2	240	FB2	264	39	72	32-33-17.0 N	97-20-42.0 W

Contour Legend

<u>Description</u>	<u>Color</u>	<u>dBu</u>
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

Appendix C
 Derating Contour Comparison Case
 South West Communications Center - Corrected Copy

WQHI705 Loc 1 460.1125 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

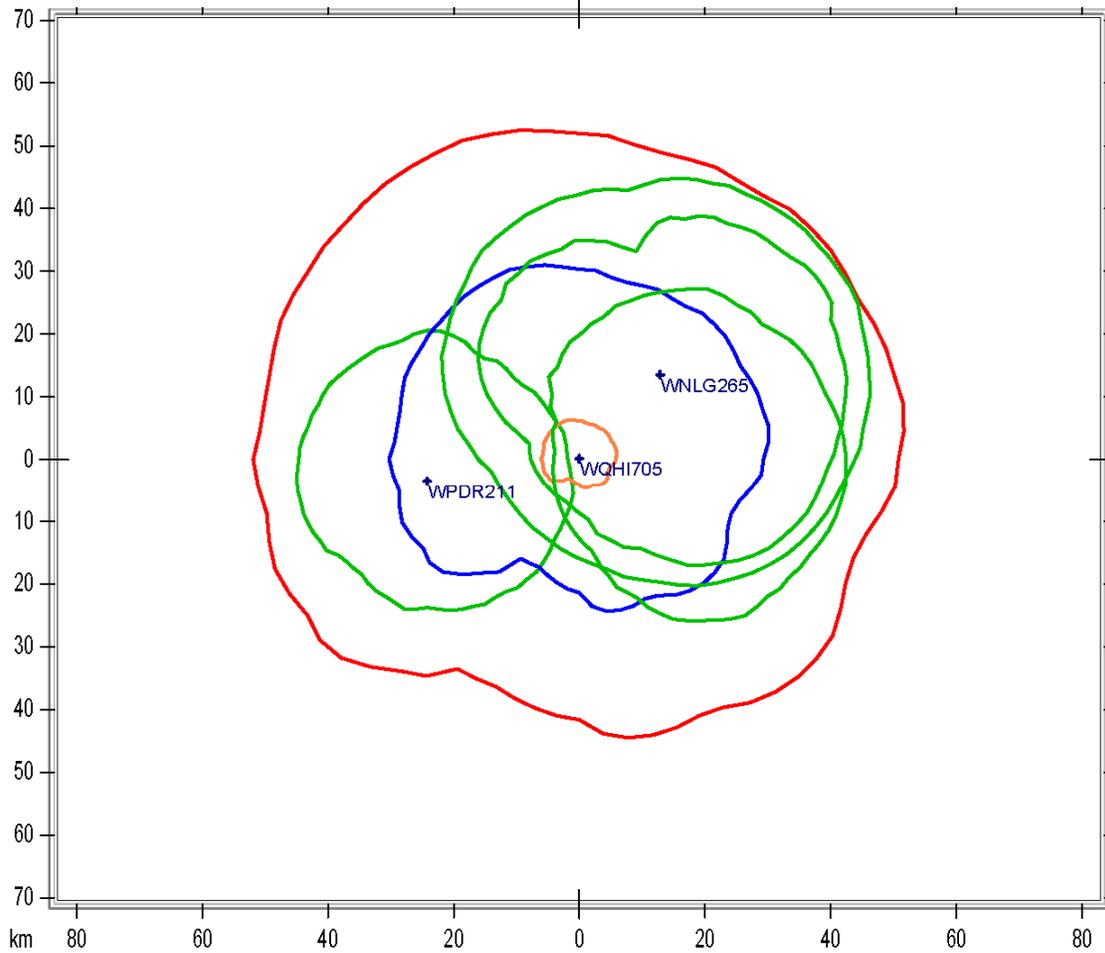
<u>Call Sign</u>	<u>Emissions</u>	<u>Freq</u>	<u>Dist km</u>	<u>ERP w</u>	<u>Class</u>	<u>GL m</u>	<u>AGL m</u>	<u>HAAT m</u>	<u>Lat</u>	<u>Lon</u>
WPNW816	20K0F3E 11K0F3E	460.1	41	40	FB2	183	37	34	32-58-14.0 N	97-09-05.0 W
WQHI705	11K2F3E	460.1125	0	100	FB8	230	40	94	32-39-43.0 N	96-54-49.0 W
WNLG265	20K0F3E	460.125	19	400	FB2	141	91	85	32-46-57.0 N	96-46-32.0 W
KKB364	20K0F3E	460.125	19	370	FB2	138	132	125	32-46-41.0 N	96-45-30.0 W

Contour Legend

<u>Description</u>	<u>Color</u>	<u>dBu</u>
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61

Appendix C
Derating Contour Comparison Case
South West Communications Center - Corrected Copy

WQHI705 Loc 1 460.2875 11k and 16k Adjacents



Red: 21 dBu Blue: 33.5 dBu Orange: 61 dBu Green: 39 dBu

<u>Call Sign</u>	<u>Emissions</u>	<u>Freq</u>	<u>Dist km</u>	<u>ERP w</u>	<u>Class</u>	<u>GL m</u>	<u>AGL m</u>	<u>HAAT m</u>	<u>Lat</u>	<u>Lon</u>
WQIK789	20K0F3E	460.275	13	500	FB2	180	42	63	32-38-46.0 N	96-46-34.0 W
WNLG265	20K0F3E	460.275	19	400	FB2	141	152	146	32-46-57.0 N	96-46-32.0 W
KKB364	20K0F3E	460.275	19	550	FB2	138	88	81	32-46-41.0 N	96-45-30.0 W
WQHI705	11K2F3E	460.2875	0	100	FB8	230	40	94	32-39-43.0 N	96-54-49.0 W
WPDR211	16K0F1D	460.3	25	95	FB2	206	91	107	32-37-46.0 N	97-10-20.0 W

Contour Legend

<u>Description</u>	<u>Color</u>	<u>dBu</u>
FCC's 90.187 UHF Cochannel Service Contour:	Green	39
FCC's 90.187 UHF Cochannel Interference Contour:	Red	21
LMCC's 12.5 kHz Adjacent Channel Contour:	Blue	33.5
Prioritized TSB88 Based 12.5 kHz Adjacent Channel Contour:	Orange	61